

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

SURGALIGN HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-90731 (CML)
)
) (Jointly Administered)
)

**CERTIFICATE OF COUNSEL TO DEBTORS' FIRST OMNIBUS
OBJECTION TO CLAIMS (NO LIABILITY CLAIMS)**

(Related Docket No. 446)

The undersigned hereby certifies as follows:

1. On September 10, 2023, the *Debtors' First Omnibus Objection to Claims (No Liability Claims)* [Docket No. 446] (the "Motion") was filed with the Court. The deadline to file responses to the relief requested in the Motion was October 10, 2023.

2. On October 3, 2023, the Department filed the *Tennessee Department of Revenue's Response to First Omnibus Objection, Schedule 1, Objection 5* [Docket No. 493] (the "Response"), filed by Tennessee Department of Revenue ("Claimant") with respect to Claim No. 3, at issue in the Motion. The Plan Administrator and counsel for Claimant agreed to abate the Motion and Response with respect to Claim No. 3 until November 30, 2023, in the interests of judicial economy. That certain *Agreed Order Abating the Debtors' Omnibus Objection with Respect to Claim Number 3* reflecting such agreement of the parties is attached hereto.

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number (if any), are: Surgalign Holdings, Inc. (0607); Surgalign Spine Technologies, Inc. (6543); Pioneer Surgical Technology NewCo Inc.; Spinal Transition and Professional Services LLC; Andi's Belmarall, LLC; Fourth Dimension Spine, LLC (1107); Holo Surgical Inc. (4079); and HoloSurgical Technology Inc. (0952). The location of the debtors' service address in these chapter 11 cases is: 520 Lake Cook Road, Suite 315, Deerfield, Illinois 60015.

3. No other objections or informal comments were received with respect to the Motion. Accordingly, the Plan Administrator has revised the order to account for the abatement with respect to Claim No. 3. A revised proposed order is attached hereto. A redline reflecting changes to the proposed order is also attached hereto.

4. The undersigned counsel hereby certifies that the revised proposed order attached hereto resolves all known formal and informal comments received, and that no answer, objection, or other responsive pleading to the Motion appears on the Court's docket.

Dated: November 2, 2023

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES, LLP

/s/ Michael D. Warner

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Counsel to the Plan Administrator

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of November, 2023, a true and correct copy of the above and foregoing was caused to be served through this Court's CM/ECF noticing system to all parties registered to receive notices in these cases.

/s/ Michael D. Warner
Michael D. Warner, Esq.